

JAP:RTP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

M 12-300

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

CHRISTIAN SECUNDINO RUIZ,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GERARD MCMAHON, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about March 26, 2012, within the Eastern District of New York and elsewhere, the defendant CHRISTIAN SECUNDINO RUIZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about March 26, 2012, the defendant CHRISTIAN SECUNDINO RUIZ arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard JetBlue Flight No. 832 from Santiago, Dominican Republic.

2. The defendant CHRISTIAN SECUNDINO RUIZ was selected for a Customs and Border Protection ("CBP") examination. The defendant possessed one brown suitcase and one black suitcase. The defendant claimed ownership of the suitcases and their contents.

3. During an inspection of the brown suitcase, a CBP officer observed that the suitcase was altered in that it had two new screws on the bottom of the bag. A probe of the suitcase revealed a white-powdery substance, which field-tested positive for the presence of cocaine.

4. The defendant's black suitcase had the same alterations as the brown suitcase. A probe of that suitcase revealed a white-powdery substance, which field-tested positive for the presence of cocaine.

5. Inside the black suitcase was a red and blue

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

suitcase. A probe of this third suitcase revealed a white-powdery substance, which field-tested positive for the presence of cocaine.

6. The total approximate gross weight of the cocaine found in the defendant CHRISTIAN SECUNDINO RUIZ's three suitcases is 8,400.8 grams.

WHEREFORE, your deponent respectfully requests that defendant CHRISTIAN SECUNDINO RUIZ be dealt with according to law.

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GERARD MCMAHON  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
26th day of March, 2012

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THE HC  
UNITEL  
EASTER

S/Reyes

\_\_\_\_\_  
ES, JR.  
UDGE  
RK